

**SHAFFY MOEEL**

California State Bar No. 238732

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Attorneys for Mr. Marroquin-Frias

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

(HONORABLE MARILYN L. HUFF)

UNITED STATES OF AMERICA,

Plaintiff,

v.

JESUS MARROQUIN-FRIAS,

Defendant.

CASE NO. 08CR0884-MLH

DATE: May 19, 2008

TIME: 2:00 p.m.

NOTICE OF MOTIONS AND MOTIONS  
TO:

(1) PRESERVE EVIDENCE AND  
COMPEL PRODUCTION OF  
DISCOVERY; AND  
(2) GRANT LEAVE TO FILE  
FURTHER MOTIONS.

TO: KAREN P. HEWITT, UNITED STATES ATTORNEY;  
DAVID LESHNER, ASSISTANT UNITED STATES ATTORNEY:

PLEASE TAKE NOTICE that on May 19, 2008 at 2:00 p.m., Jesus Marroquin-Frias, by and through his attorneys, Shaffy Moeel and Federal Defenders of San Diego, Inc., will ask this Court to enter an order granting the following motions:

(1) compelling discovery and preservation of evidence; and

(2) granting leave to file further motions.

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1 These motions are based upon the instant motions and notice of motions, the attached statement  
2 of facts and memorandum of points and authorities, the files and records in the above-captioned matter, and  
3 any and all other materials that may come to this Court's attention prior to or during the hearing of these  
4 motions.

5  
6 Respectfully submitted,

7 Dated: May 13, 2008

8 /s/ Shaffy Moeel  
9 **SHAFFY MOEEL**  
Federal Defenders of San Diego, Inc.  
Attorneys for Mr. Marroquin-Frias